



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**STEVEN E. SMITH**  
*Assistant Corporation Counsel*  
Labor & Employment Division  
(212) 356-1106  
stevsmit@law.nyc.gov

January 16, 2024

**VIA ECF**

Hon. Joseph A. Marutollo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Collins v. N.Y.C. Dep't of Educ. et al.*  
23-cv-9248-JAM

Dear Magistrate Judge Marutollo:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I write to request that Your Honor extend the time for Defendants New York City Department of Education (“DOE”), the City of New York (“City”), and New York City Public Schools to respond to the Complaint in this action from January 18, 2024 to March 18, 2024. This is the first such request by Defendants. Plaintiff *pro se* has not responded to my requests for her consent to this extension request.

A brief extension of time is requested to allow the undersigned to investigate the facts of the case, including obtaining any underlying documentation that may exist with respect to Plaintiff’s allegations, and to formulate an appropriate response to the Complaint. I was just assigned this case on January 10, 2024.

This extension will not impact any other current deadlines. Accordingly, Defendants respectfully request that the time to respond to the Complaint be extended until March 18, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'SE Smith', written in a cursive style.

Steven E. Smith  
Assistant Corporation Counsel

cc: Latanya Collins  
*Plaintiff Pro Se*  
P.O. Box 341143  
Queens, New York 11434  
(631) 318-0153